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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Tameia City,

Plaintiff,

vs.

The United States of America,  
Defendant.

Case No.: 2:20-cv-02193-JCM-EJY  
**(Lead Case)**

Case No.: 2:21-cv-00006-JCM-EJY  
**(Consolidated Case)**

**Stipulation to Reopen Discovery Extend  
Discovery Plan and Scheduling Order  
(Seventh Request)**

Emely Johana Portillo, an individual; and  
Eva Lilian Leonzo de Portillo, an  
individual,

Plaintiffs,

vs.

The United States of America,  
Defendant.

The parties stipulate to reopen discovery in this matter for 60 days. This is the seventh request to extend the Stipulated Discovery Plan and Scheduling Order. The parties stipulate to reopen discovery because Plaintiffs made supplemental disclosures of medical treatment and were still treating shortly before discovery closed. In addition, the United States has recently substituted new counsel who will need time to get up to speed on the case.

**I. Discovery Completed**

The parties have exchanged written discovery in the form of interrogatories and requests for production of documents. The parties have taken depositions of the Plaintiffs and the government driver. The parties have exchanged expert disclosures.

**II. Discovery Remaining**

The United States may need to conduct further discovery in the form of subpoenas and depositions of Plaintiffs' treating providers.

**III. Why Discovery Has Not Been Completed**

Plaintiffs made supplemental disclosures of medical treatment and were still treating shortly before discovery closed. The United States may need to conduct further discovery in the form of subpoenas or depositions of treating providers based on the supplemental disclosures. In addition, the United States' counsel will be leaving the U.S. Attorney's Office on March 22, 2024, and will be substituting in a new AUSA to represent the United States. The United States' new counsel will need some additional time to get up to speed on the case. The parties intend to request a settlement conference at the close of discovery.

**IV. ~~Proposed~~ Deadlines**

Close of Discovery: May 22, 2024 (from November 20, 2023)

Dispositive Motions: June 22, 2024 (from December 20, 2023)

Joint Pre-Trial Order: July 22, 2024 (from January 22, 2024)

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1 Respectfully submitted this 27th day of March 2024.

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3 JASON M. FRIERSON  
United States Attorney

4 /s/ R. Thomas Colonna  
5 R. THOMAS COLONNA  
6 Assistant United States Attorney

7 THE SCHNITZER LAW FIRM

8 /s/ Jordan P. Schnitzer  
9 JORDAN P. SCHNITZER  
Attorney for Plaintiff City

10 STOVALL & ASSOCIATES

11 /s/ Ross Moynihan  
12 ROSS MOYNIHAN  
13 Attorney for Plaintiffs Portillo and de  
14 Portillo

15 **IT IS SO ORDERED:**

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18 **UNITED STATES MAGISTRATE JUDGE**

19 **DATED:** March 28, 2024  
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